

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

MICHAEL MILLER,	:	No. 1:24-cv-00014-JPW-MCC
Plaintiff,	:	
	:	
v.	:	(Judge Wilson)
	:	(Magistrate Judge Carlson)
COUNTY OF LANCASTER, <i>et al.</i> ,	:	
Defendants.	:	(Electronically filed)

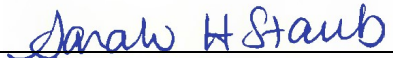
**DEFENDANT COUNTY OF LANCASTER’S
MOTION FOR SANCTIONS**

Defendant County of Lancaster (the “County”), by and through its undersigned counsel, hereby moves for sanctions against Plaintiff Michael Miller (“Miller”) pursuant to Federal Rule of Civil Procedure 11. Miller initiated the above-captioned action against the County based on frivolous claims not supported by existing law and, therefore, has violated Fed. R. Civ. P. 11(b)(2). Miller was properly served notice (Ex. A) of the County’s intention to seek sanctions against him on April 16, 2024, pursuant to Fed. R. Civ. P. 11(c)(2), but Miller has refused to withdraw his baseless claims as to the County within the applicable 21-day safe harbor period. Even after receiving this notice, Miller continues to file numerous meritless pleadings. (*See, e.g.*, Docs. 39, 44, 45, 46). As a result, and for the reasons set forth in the County’s supporting brief, the Court should sanction Miller and order him to pay the County’s reasonable attorneys’ fees in defending this lawsuit, which are presently estimated to be approximately \$30,000.

WHEREFORE, Defendant County of Lancaster respectfully requests that this Court grant its Motion for Sanctions and award the County reasonable attorneys' fees incurred because of Plaintiff Michael Miller's misconduct.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 
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Dated: May 8, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document on all parties and/or counsel of record by operation of the Court's electronic filing system.

McNEES WALLACE & NURICK LLC

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